

JS 44 (Rev. 12/12)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS Adam Solow, Esq.		DEFENDANTS Loretta Lynch, et. a		
(b) County of Residence of (Ελ	First Listed Plaintiff Philadelphia CEPT IN U.S. PLAINTIFF CASES)		of First Listed DefendantW	
(c) Attorneys (Firm Name, 2 Solow, Isbell & Palladino, Philadelphia, PA 19102;	LLC 1601 Walnut St. Ste 1523	Attorneys (If Known)		
II. BASIS OF JURISDI	CTION (Place an "X" in One Box Only)	III. CITIZENSHIP OF P		
☐ 1 U.S. Government Plaintiff	3 Federal Question (U.S. Government Not a Party)		FF DEF 1 M 1 Incorporated or Print of Business In Thi	
☑ 2 U.S. Government Defendant	1 4 Diversity (Indicate Citizenship of Parties in Item III)	Citizen of Another State	2	
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VII. REQUESTED IN COMPLAINT:	Writ of Mandamus/declaratory judg ☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.	·	CHECK YES only i JURY DEMAND:	f demanded in complaint:
VIII. RELATED CAS IF ANY	E(S) (See instructions): JUDGE		DOCKET NUMBER	
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UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA — DESIGNATION FORM to be assignment to appropriate calendar.	ised by counsel to indicate the category of the case for the purpose of
Address of Plaintiff: 1601 Walnut St, 5	te 1523 Philadelphia PA 19102
Address of Defendant: 950 Pennsylvania Ave, 1	Washington, X 20530
Place of Accident, Incident or Transaction: Philadelphia (Use Reverse Side For Add	itional Space)
Does this civil action involve a nongovernmental corporate party with any parent corporation and	any publicly held cornoration owning 10% or more of its stock?
(Attach two copies of the Disclosure Statement Form in accordance with Fed.R.Civ.P. 7.1(a))	Ycs□ Note
Does this case involve multidistrict litigation possibilities? RELATED CASE, IF ANY:	Yes□ No[U
Case Number:Judge	Date Terminated:
Civil cases are deemed related when yes is answered to any of the following questions:	
1. Is this case related to property included in an earlier numbered suit pending or within one year	previously terminated action in this court?
	Yes□ No □
Does this case involve the same issue of fact or grow out of the same transaction as a prior suit action in this court?	pending or within one year previously terminated
action in this court	Yes□ No 🗹
3. Does this case involve the validity or infringement of a patent already in suit or any earlier nur	
terminated action in this court?	Yes Not
	and the the same individual
4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights of	
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2. □ FELA	2. □ Airplane Personal Injury
3. □ Jones Act-Personal Injury	3. Assault, Defamation
4. □ Antitrust	4. □ Marine Personal Injury
5. □ Patent	5. □ Motor Vehicle Personal Injury
6. □ Labor-Management Relations	6. □ Other Personal Injury (Please specify)
7. Civil Rights	7. Products Liability
8. Habeas Corpus	8. Products Liability — Asbestos
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9. Securities Act(s) Cases	•
10. Social Security Review Cases	(Please specify)
11. All other Federal Question Cases (Please specify) Mandamia	
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☐ Pursuant to Local Civil Rule 53.2, Section 3(c)(2), that to the best of my knowledge and be	
\$150,000.00 exclusive of interest and costs;	
□ Relief other than monetary damages is sought.	D
DATE: 9/3/15	PA 201466
Attorney-at-Law	Attorney I.D.#
NOTE: A trial de novo will be a trial by jury only if there	has been compliance with F.R.C.P. 38.
I certify that, to my knowledge, the within case is not related to any case now pending or we except as noted above.	ithin one year previously terminated action in this court
9/2/19	PA Dawid
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Attorney-at-Law	Attorney I.D.#

CIV. 609 (5/2012)

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

CASE MANAGEMENT TRACK DESIGNATION FORM

CIVIL ACTION

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a Case Management Track Designation Form specifying the track to which that defendant believes the case should be assigned. SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS: (a) Habeas Corpus – Cases brought under 28 U.S.C. § 2241 through § 2255. (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. (d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. (e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) (f) Standard Management – Cases that do not fall into any one of the other tracks. (g) Alcum Signation. Control Telephone FAX Number E-Mail Address	V.			
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(Civ. 660) 10/02

Solow

Adam Solow, Attorney for Plaintiff Solow, Isbell & Palladino, LLC 1601 Walnut Street, Ste. 1523 Philadelphia, PA 19102 (t) 215-564-1990 (f) 215-564-1998/ adam@sipimmigration.com

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

Adam M. Solow	
Addin 141, 5010 W	
Plaintiff,	Civil Action No:
v.	
· ·	Complaint for Declaratory
	and Injunctive Relief
	under Writ of Mandamus
Loretta LYNCH, Attorney General of the,	
United States; Thomas BRANDON, Acting	
Director of the Bureau of Alcohol Tobacco	
,	
And Firearms; Jeh JOHNSON, Secretary of)
The Department of Homeland Security;	
R. Gill KERLIKOWSKIE Commissioner of)	
United States Customs and Border)	
Protection; William MAJORS, ATF Chief,	
Firearms and Explosives Branch, Susan	
STRANIERI, Port Director, Philadelphia,	
Essam RABADI, Special Agent in Charge,	
ATF Philadelphia Field Office.	
Defendants.	<u> </u>

COMPLAINT FOR WRIT OF MANDAMUS

To the Honorable Judge of Said Court:

INTRODUCTION:

This action is brought by the Plaintiff to compel the Defendants to release a work of art that has been unlawfully seized by the Defendants and improperly classified as a "firearm" by the Defendants. The Plaintiff seeks this Court's declaration that the object in question is not a "firearm," that it is in fact a work of art, and that it must immediately be released by the Defendants into the Plaintiff's possession. The work of art has been unlawfully impounded by the Defendants since it arrived in the United States on or around April 17, 2015. After repeated attempts by the Plaintiff to demonstrate that the object is a work of art, as opposed to a destructive device or firearm not subject to the Defendants' jurisdiction or regulation, and not a firearm, they have ceased to yield in their assertion that the object is a dangerous object or firearm and that it can only be imported if effectively destroyed or if the Plaintiff, and even then only after obtains an arms importation license for each of its constituent parts. The Plaintiff seeks redress from this Court because of the impasse between himself and the Defendants and prays that this Court will order Defendants to immediately release the work of art, and award damages to the Plaintiff equal to the costs

associated with the work of art's impoundment for the last four and a half months.

PARTIES:

- 1. The lead Plaintiff, Adam Solow, is an art collector who resides in Philadelphia, PA. On or around April 17, 2015 a sculpture he purchased from world-renowned artist Goncalo Mabundo named *War Throne* (hereinafter "the work of art") arrived in the United States. *See* Ex. B. He purchased the work of art for \$8,200. *Id.* Since its arrival in the United States, the work of art has been quarantined by the Defendants in various warehouses. *See* Ex. B.
- 2. The Defendant, Loretta Lynch, is the Attorney General of the United States, the head officer in the Department of Justice, an executive agency of the United States government. She represents the United States in legal matters and gives advice and opinions to the President and to the heads of the executive departments of the Government.
- 3. The Defendant, Jeh Johnson, is the Secretary of the U.S. Department of Homeland Security, an executive agency of the United States government. He is charged by law with the enforcement of US customs laws and regulations such as those relating to the importation of goods, such as the work of art, into to the United States. He is

- likewise charged with ensuring that local level customs officials properly interpret and enforce customs laws and regulations.
- 4. The Defendant, Thomas Brandon, is the acting Director of the Bureau of Alcohol, Tobacco, and Firearms, (ATF), a sub-agency within the U.S. Department of Justice, an executive agency of the United States government. ATF is charged by law with administering federal laws and regulations related to the use, possession, sales, and definition of alcohol, tobacco, and firearms related materials in the United States.
- 5. The Defendant, R. Gill Kerlikowskie, is the Commissioner of United States Customs and Border Protection, a sub-agency of the United States Department of Homeland Security. In his position he is charged with enforcing and administering customs laws and regulations, as well the operation of ports of entry into the United States, such as the airport, where the work of art entered the United States.
- 6. The Defendant, William Majors, is an ATF official charged with administering and enforcing ATF statutes and regulations such as the determination as to whether objects are firearms and/or destructive devices subject to ATF control and limitation;
- 7. The Defendant, Susan Stranieri, is the Port Director of the Philadelphia Port of Entry operated by United States Customs and

Border Protection and the Department of Homeland Security. She is charged with the administration and enforcement of customs laws and regulations within the Philadelphia area. She is also responsible for ensuring that CBP officials working at ports of entry in the Philadelphia area properly enforce and administer customs laws and regulations related to goods entering the United States through ports of entry in the Philadelphia region, such as the work of art.

8. The Defendant Essam Rabadi, is the ATF Special Agent in charge for the ATF field office. He is responsible for the day-to-day enforcement and administration ATF laws and regulations as well as the supervision of ATF agents in the field within the Philadelphia ATF district.

JURISDICITION:

9. This is a civil action brought pursuant to 28 U.S.C. §§ 1331 and 1361 to redress the deprivation of rights, privileges, and immunities secured by Adam Solow, by which jurisdiction is conferred to compel the Defendants and those working under them to defend their classification of the work of art as a firearm and/or destructive device subject to ATF regulation as well as their subsequent seizure and

- sequestration of the work of art preventing the Plaintiff from possessing, displaying, and enjoying it.
- 10. Jurisdiction is also conferred by 5 U.S.C. § 704 because the Plaintiff is aggrieved by adverse executive agency action, as the Administrative Procedure Act requires in order to confer jurisdiction on the District Courts. See 5 U.S.C. §§ 702, et. seq.
- 11. The aid of the Court is further invoked under 28 U.S.C. §§ 2201 and 2202, which authorize declaratory judgments, such as the relief that the Plaintiff is seeking: namely that the work of art is not a firearm and/or destructive device, that it is therefore not subject to ATF or CBP restrictions, and that the Defendants wrongfully seized and impounded it upon its entry into the United States.

VENUE

12. Venue is proper in Philadelphia, Pennsylvania and the United States

District Court for the Eastern District of Pennsylvania, in that this is
an action against officers and agencies of the United States in their
official capacities and where a substantial part of the events or
omissions giving rise to the Plaintiff's claim occurred. See 28 U.S.C
§ 1391(e)(2).

LEGAL PRECEDENT, CHALLENGED PRACTICES, AND CAUSE OF ACTION

- 9. In seizing the Plaintiffs property and work of art, the Defendants have indicated a belief that the work of art is a "firearm" or "destructive device" subject to possession and importation restrictions administered and overseen by the Defendants. See, e.g., Ex C. (containing correspondence from defendants to Plaintiff related to the work of art).
- 10. The Defendants are tasked with enforcing US customs law and in regulating the importation of "firearms" and other "destructive devices." *See*, *e.g.*, 18 USC sect. 921(a)(3)(defining "firearm" and "destructive device"). A vital first step in determining whether the Defendants have the ability to restrict the importation of an item into the United States is the determination of whether an object is a "firearm" or a "destructive device," as defined by law. *See*, *e.g.*, *Butt v. Gonzales*, 429 F.3d 430, 438 (3d Cir. 2005)(stating "In the law, as in all things, common sense must be [the] guide.").
- 11. Within the definition of "firearm" and "destructive device" are several crucial caveats related to articles that are not subject to Defendants' ability to restrict, although at first blush they may appear to objects within the Defendants' ability to restrict. *Id.* For example,

in order to be a "firearm," an object must be able to be "readily convertible" to fire a projectile. *Id*. Furthermore, the definition of "firearm" states that objects that "are not likely to be used as a weapon" are not within the statutory definition of "firearm" or "destructive device." And the same is true for objects that are going to be used "solely…for cultural purposes." *Id*.

12. The Plaintiff alleges that the Defendants erroneously, or at least incompletely, considered and applied their own statutory definitions of articles falling under the definition of "firearm" or "destructive device" as set forth at 18 USC § 921(a)(3). This is because we assert that a reasonable fact finder would determine that the work of art is not a "firearm" or "destructive device," because a proper inspection and assessment of the work of art would convince a reasonable mind that it is an object not likely to be used as a weapon, an object that will only be used for cultural purposes, and that it as a whole or its parts is not readily convertible into a weapon or weapons. See, e.g., Ex A, see also generally Ex D (containing photographs and descriptions of the work of art as well as media coverage of works of art by Goncalo Mabundo in general).

13. The Plaintiff also alleges that the Defendants are treating his work of art and his attempt to add to his own collection of contemporary African Art unfairly in light of the fact that other works of art by Goncalo Mabundo, also constructed entirely of decommissioned weapons, have been displayed at museums and cultural institutions in the United States and sold in the United States at art galleries to private collectors. See generally Ex D (concerning past examples of display and sales of Goncalo Mabundo's works – all made of decommissioned weapons – in the United States, including the fact that one of his thrones is currently on display at the Brooklyn Museum). Inasmuch as the Plaintiff is being treated differently than other individuals and institutions in the United States who have purchased and displayed Mr. Mabundo's works of art, we assert that the Defendant's impoundment of the work of art violates the Administrative Procedure Act as an arbitrary and capricious agency action. See, e.g., 5 U.S.C. §§ 702, et. seq.

REMEDY SOUGHT:

14. The Plaintiff respectfully asks that this Court declare that the work of art is not a firearm or a destructive device as defined by 18 USC sect. 921(a)(3) because it is not likely to be used as a weapon, because it is

not readily convertible to fire any projectile, and because it is an object that is unquestionably only going to be used for cultural purposes. *Id*.

15. Furthermore, given that the work of art has been improperly classified as a firearm or destructive device and subsequently impounded since it arrived in the United States, the Plaintiffs are seeking damages equal to the costs that have been imposed for the storage of the object during its impoundment.

EXHAUSTION OF ADMINISTRATIVE REMEDIES:

16. There is no administrative remedy prescribed for the improper classification of an object as a firearm, and as this case is being brought under the umbrella of the Administrative Procedure Act, the Defendants' determination that the work of art is a firearm or destructive device amounts to a final agency decision. *See* 5 USC sect. 704; *see also Darby v. Cisneros*, 509 US 137 (1993).

PRAYER:

17. Wherefore, the Plaintiffs pray that this Honorable Court declare that *War Throne* is a work of art and not a firearm or destructive device, and then order the Defendants to release it to Plaintiff without further delay.

18.As noted above, the Plaintiff also prays that the Court require the Defendants to pay for all storage costs related to the work of art's impoundment, given that it was improperly quarantined after being wrongfully classified as a firearm or destructive device within the scope of 18 USC 921(a)(3).

Respectfully Submitted,

Adam Solow, Esq.

PA Reg.# 204466

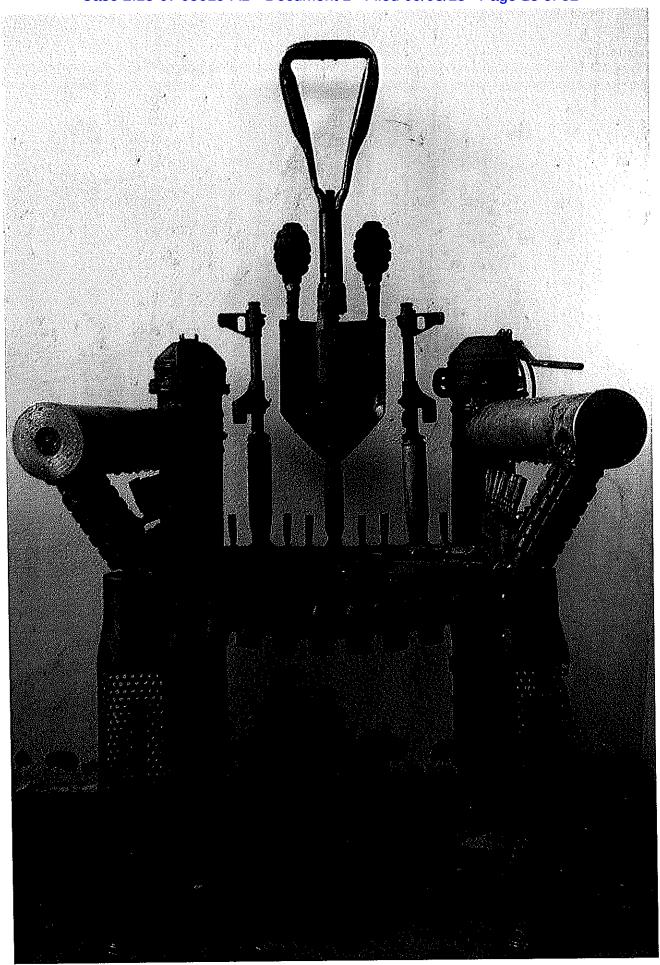
Attorney for Plaintiff

ams2324

PLAINTIFF'S LIST OF EXHIBITS IN SUPPORT OF COMPLAINT IN RE SOLOW V. LYNCH, et al

- A) A color photograph of *War Throne*, by Goncalo Mabundo, the work of art at the center of this controversy;
- B) Documents related to its importation to the United States and subsequent seizure and impoundment;
- C) Correspondence dated June 11, 2015 from the Defendants indicating that the work of art had been deemed a firearm or destructive device, suggesting that the Plaintiff could not bring it into the United States or possess it without an arms importation license, and that even upon licensure, vital components of the objects artistic integrity would have to be "destroyed," "crushed," or "mangled" and an "AK Machinegun Barrel Destruction for Importation" diagram provided by Defendants to Plaintiff indicating that the two AK barrels associated with the work of art have been properly cut inasmuch as they are cut behind the "gas port block" Compare Ex. A.
- D) Various mass media accounts of Goncalo Mabundo's works of art constructed entirely decommissioned weapons, including their display and sale in the United States:
 - a. Tim Hume, Artist Creates Objects of Beauty from Instruments of Death, CNN (Mar. 22., 2012), available at: http://www.cnn.com/2012/03/22/world/africa/goncalo-mabunda-mozambique-artist-inside-africa/
 - b. Jack Bell Gallery, Goncalo Mabunda (artist profile), available at: http://www.jackbellgallery.com/artists/29-Gon%C3%A7alo-Mabunda/overview/
 - c. Club of Mozambique, Goncalo Mabunda to be the First Mozambican in Venice Biennale (Mar. 3. 2015), available at: http://www.clubofmozambique.com/solutions1/sectionnews.php?secao=en tertainment&id=2147487830&tipo=one
 - d. Janise Elie, *Art of War: melding arms into weapons of mass attraction in pictures,* The Guardian (Mar 6, 2014), *available at:* http://www.theguardian.com/global-development/gallery/2014/mar/06/art-of-war-melding-arms-into-weapons-of-mass-attraction-in-pictures
 - e. African Artists for Development, AAD at the Annual Clinton Global Initiative Summit in New York (Sept. 23, 2011); available at http://aadfund.org/en/aad-at-the-annual-clinton-global-initiative-summit-in-new-york (showing the artist shaking hands with President Bill Clinton);

- f. Ethan Cohen Gallery, *Goncalo Mabundo (artist profile), available at*: http://www.ecfa.com/#!goncalo-mabunda/cy8z (indicating that the artists' works of art have been on sale in the United States);
- g. Brooklyn Museum, *Harmony Chair*, *available at*: https://www.brooklynmuseum.org/opencollection/objects/212071/Harmon y_Chair
- h. Goncalo Mabunda, *Exhibitions*, *available at*, <u>www.goncalo-mabunda.com/en/exhibitions</u> (last accessed on Sept. 3, 2015), indicating that the artist's work of art has been displayed in exhibitions in the United States no less than two times.



CARGO ACCEPTANCE SECURITY CONTROL CONTROLO DE SEGURANÇA PARA ACEITAÇÃO DE CARGA

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ORIGINAL 2 (FOR CONSIGNEE)

Case 2:15-cv-05019-AB Document 1 Filed 09/08/15 Page 22 of 82 047-6833 1152 047 MPM 6833 1152 Not Negotiabia Shipper's Name and Address GONCALO MABUNDA Air Waybill TAP PORTUGAL AV. KARL MARX 1834 issu∈d By 1704-801 LISBOA MAPUTO **PORTUGAL** MOZAMBIQUE CIPC PT 500 278 725 TEL: 258843607317 Consignee's Account Number Consignee's Name and Address ADAM M. SOLOW U.S CUSTOMS IN-BOUND AWB LLC 1601 WALNUR STREET PHL-1108 IT 61 SUITE 1523 EUA PHLADELPHIA EWR/4601 PHILADELPHIA, 19102 Destination Entry Type 19-Apr-15. **TP203** TP TEL: 2155641990 Importing Carrier Flight Number Arrival Date issuing Corner's Agent and City FORWARDAIR 62-155497200 TAP PORTUGAL 19-Apr-15 MAPÜTO Bonded Carrier/Exporter Date 19-Apr-15 ILIDA: Agent's IATA Code Date . Signature Of Carrier Agent (or Exporter) 56-4-9011/4 Airport of Departure (Addr. of First Carrier) and Requested Routing U.S Customs Officer Date Maputo Value For Customs Declared Value For Carriage To/By WINAL PHL MZN PPX NVD NCV TP. EW LIS TAP Portugal Airport of Destination TP 203/19 XXX TP.282/13 Philadelphia Handling Information SPX\307066\XRAY\10APR15 SCI Nature and Quantity of Goods (Incl. Dimensions or Volume) Gross Weight Rate / Change No of Pieces Chargeable Weight Total ART WORK 82.00 8,200.00 1 -42,6 100.0 Dims: 70 x 75 x114 x 1 70 x 75 x114 x 1 8,200,00 Volume:0,600 42.6 Prepaid Other Charge: SCC 43.00 8,200.00 MYC 1,789.00 500.00 AWC Valuation Charge Shipper confines that the particulars on the face hereof are correct and that insofar as any part of the consignment contains dangerous goods, such part is properly described by name and is in proper condition for carriage by air according to the applicable Dangerous Goods Regulations. Total Other Charges Due Agent

ORIGINAL 2 (FOR CONSIGNEE)

10 Apr 2015

For: GONCALO MABUNDA

Maputo

TAP PORTUGAL

as agent for

FAP Portugal

e of Issuing Canter or its Agent - 047-6833 1152

Total Other Charges Due Carrier

Total Collect

2,332,00

10,532.00

Total Prepaid

Case 2:15 cv-05019-AB Document 1 Filed 09/08/15 Page 28 of 82 047-6833 1152 047 MPM 6833 1152 Not Negotiebie Shapper's Name and Address GONCALO MABUNDA Shipper's Account Number Air Waybill TAP PORTUGAL AV. KARL MARX 1834 6 issued By 1704-801 LISBOA MAPUTO **PORTUGAL** MOZAMBIQUE CIPC PT 500 278 725 TEL: 258843607317 Consignee's Name and Address ADAM M. SOLOW LLC 1601 WALNUR STREET Consignee's Account Numbe U.S CUSTOMS IN-BOUND AWB PHL-1108 EWR/4601 IT 61 SUITE 1523 EUA PHLADELPHIA PHILADELPHIA, 19102 Origin Entry Type Destination **TP203** 19-Apr-15. TP TEL: 2155641990 Issuing Conter's Agent and City Flight Number Arrival Date Importing Carrier TAP PORTUGAL 62-155497200 FORWARDAIR 19-Apr-15 MAPÜTO Date Bonded Carrier/Exporter ILIDA · 19-Apr-15 Agant's IATA Code Signature Of Carrier Agent (or Exporter) Date 56-4-9011/4 Airport of Departure (Addr. of First Carrier) and Requested Routing Maputo Date U.S Customs Officer Declared Value For Carriage Declared Value For Customs By First Came Yo / HV To/By WINAL LIS PHL NCV TAP Portugal EW TP. MZN PPX NVD Airport of Dest FlightDate Amount of Insurance TP 203/19 Philadelphia XXX TP 282/13 Handling information SPX\307066\XRAY\10APR15 SCI Rate / Charge Gross Weight Total 1 -42.6 100.0 82.00 8,200.00 ART WORK Dims: 70 x 75 x114 x 1 70 x 75 x114 x 1 42.6 8,200,00 Volume:0.600 Prepaid 1,789.00 8,200,00 MYC SCC 43.00 AWC 500.00 Valuation Charge Shipper confines that the particulars on the face hereof are correct and that insofar as any part of the consignment contains dangerous goods, such part is properly described by name and is in proper condition for carriage by air according to the applicable Dangerous Goods Regulations. Yotal Other Charges Due Agent Total Other Charges Due Canier 2,332.00 For: GONCALO MABUNDA

ORIGINAL 2 (FOR CONSIGNEE)

10 Apr 2015

Total Precaid

10,532.00

Total Collect

Signature of Shipper or his Ag

Maputo

TAP PORTUGAL

as agent for

FAP Portugal of Issuing Carrier or its Agent 047-6833 1152

ORIGINAL 2 (FOR CONSIGNEE)

Maputo

at (Place)

10 Apr 2015

Executed On (Date)

TAP PORTUGAL

as agent for

FAP Portugal

f Issuing Carrier or its Agent

047-6833 1152

Total Prepaid

10,532.00

Total Collect

COPY 4 (DELIVERY RECEIPT)

047-6833 1152

COPY 7 (FOR SECOND CARRIER)

10 Apr 2015

Executed On (Date)

Maputo

at (Place)

as agent for

TAP Portugal

of Issuing Carrier or its Agent

047-6833 1152

10,532.00

WAREHOUSE SERVICE INC

1501 Admiral Wilson Boulevard, Camden, NJ 08109

Adam M.Solow 1601 Walnut Street Suite 1523 Philadelphia, PA,

Tuesday, May 05, 2015

RE:

General Order # 15-1108-W-5154

Item: Art Work

United States Customs Service

Dear Sirs:

Warehouse Service Inc. is a public warehouse serving the import, export and domestic community of the Delaware Valley. We are also a US Customs Bonded warehouse that holds goods for US Customs for various reasons **We are only the messenger** and are trying to help you recover your merchandise. The following has been prepared for your general knowledge, please act on the information.

As you are aware storage of certain goods named in the United States Customs Form 6043, en-closed, are your obligation to manipulate as the importer of record. You have three methods in satisfying the encumbrance placed upon you:

- 1. If you wish to receive the merchandise imported, notify your customs broker that you have a shipment in General Order, in the Port of Philadelphia, General Order Warehouse. To ascertain the lien status and the amount owed please have them call Warehouse Service Inc. at 856-365-0333 and ask for the General Order Administrator. After payment you may have the goods shipped to any destination.
- 2. Export your merchandise using the same method as stated above.
- 3. If you want you may abandon your freight to US Customs. All liens and costs will fall to the expected revenue of your merchandise at sale. Short falls of revenue may require some financial impute on your part.

Please act immediately as you are in a time sensitive period. You have six months from the time of import until your merchandise goes to forced government sale and if you do not satisfy the ac-count or abandon the goods, action by the lien holders under the "Uniform Commercial Code" (UCC) may be placed against you.

Sincerely yours,

General Order Administrator

Case 2:15-cv-05019-AB Document 1 Filed 09/08/15 Page 36 of 82

DEPARTMENT OF THE TREASURY UNITED STATES CUSTOMS SERVICE	DELIVER	Y TICKET	PORT	ENTRY NUMBER (IT, G.	O., Detention, SZ, Other, describe)
19 CFR 4.34, 4.37, 19.9; 19 USC 1551a, 1565		and the second	1108		
	legone	ELIVERED TO		15-110	18-W-5154
TRANSFER CARTAGE	RELEASE	ELIVERED TO			
GOODS DELINEBED FROM (Pler, Station, Airport, etc.)	Warehouse Serv	rices inc.	DATE OF ENTRY	
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1000 Heliderson biya.		Camden, NJ 0810	9	4 /2 1/2	2010
				DATE OF ARRIVAL	
Folcroft, PA, 19032-					
(610) 532-6560					
NAME AND ADDRESS OF CONSIGNEE Adam M. Solow	AIR WAYE	BILL OR BILL OF LADING NO.			
	0	47-68331152			
1601 Walnut Street	NAME OF	IMPORTING CARRIER (If Aidine,	, Give Ainine and Fit. No.)		
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C.H. LICENSE NUMBER TRUC	KNUMBER	COMPANY NAME A	ND SIGNATURE OF CARTMAN	/LIGHTERMAN/COMMO	N CARRIER
C522					
DELIVERING CUSTOMS OFFICER DATE	AND TIME 05/15/2015	RECEIVING CUSTO	MS OFFICER	DATE AND	TIME
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Worldwide Flight Services

Air Cargo Transfer Manifest

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	(Name of Trucking Company)			į,	Name and Algorithms of Trucking co. Driver)		

Worldwide Flight Services Cargo - EWF 3uilding 340-1 Airis Drive Newark Liberty International Airport Newark NJ 07114 9 973 961 3283

≥ 973 824 0020 EWRSQWFS@Worldwideflight.com

Track your shipment and CBP status at WWW.AWBTRACK.COM

Case 2:15-cv-05019-AB Document 1 Filed 09/08/15 Page 39 of 82



DEPARTMENT OF JUSTICE

JUN 1 1 2015

Bureau of Alcohol, Tobacco, Firearms and Explosives Firearms & Explosives Imports Branch 244 Needy Road, Suite 1350 Martinsburg, WV 25405

JUN 09 2015

901030:WW Ref:Solow

Adam Solow 1601 Walnut Street, Ste 1523 Philadelphia, PA 1902

Dear Mr. Solow:

We are returning your ATF form 6 Part I application dated May 15, 2015, for the reasons indicated below.

The article you seek to import appears to be constructed of rifle parts, grenade parts and ammunition shells and casing. When completing the Form 6 Part I, each rifle part, grenade part and ammunition shell casing must be listed as a separate line item on the application with name of manufacturer and address for each item listed.

Section 922(a)(3) of Title 18, United States Code, makes it unlawful for you, as an unlicensed individual, to import a firearm, destructive device into the United States. In order for you, an unlicensed individual, to import the art piece into the United States, the ammunition and grenade parts must be destroyed to ATF specifications. The ammunition shell casings must be crushed or mangled in such a way as to prevent reloading; we have attached diagrams for the destruction of the AK machinegun barrels.

You may elect to engage the services of a Federal Firearms licensee located in your State of residence to act as your import agent to bring your art piece into the United States provided it is in an importable configuration. Any ammunition shells or casings for nonsporting rounds would still need to be destroyed to ATF specifications as would the grenade bodies. Any licensee other than a Type "03" licensed collector, should complete and sign the enclosed Form 6 Part I application and return it to us for processing. The application can be downloaded from the ATF website at www.atf.gov, and submitted in triplicate. Please request your licensee to return a copy of this letter when submits the permit application on your behalf.

Sincerely yours,

William E. Majors

Chief, Firearms and Explosives Imports Branch

Enclosure

AK Wachinegun Bernel Destruction for Importation

Second cut, behind gas-port block



First cut, not more than % of an inch from the front of rear sight block

displayed in the photo above. (pointed out via red arrows) is completely severed by torch or saw-cutting it in the two critical areas that are I The destruction of an AK-type machinegun barrel is ensured when the barrel

2 Fact out must completely sever the barrel while displacing at least a quarter ाको को material at each cut location.

हरूमा १७। । इन्हें अंद्रिक्ता १७०० कि 2. ⑤ne gut must be made at a distance of no more than 光 of an inch from the

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U.S. Edition 🗸

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ONN SPECIAL PEPORT

TUESDAY



Artist creates objects of beauty from instruments of death

By Tim Hume, for CNN

① Updated 9:40 AM ET, Thu March 22, 2012

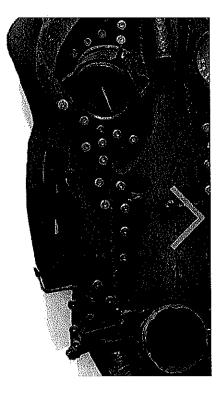












Inside Africa



11 ways to see Africa from the air

Vintage helicopters, ziplines, private flying safaris offer new, spectacular views of wildlife and rugged terrain.



Uganda clerics: Is gay OK?

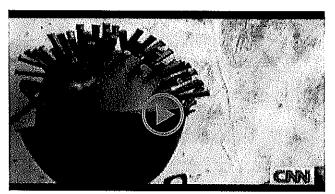
Photojournalist Daniella Zalcman asked Uganda's religious leaders their views on homosexuality. Their answers might surprise you. Goncalo Mabunda is an acclaimed sculptor who creates objects of beauty from instruments of death.

From his workshop in Maputo, he fashions his artworks -- masks, thrones and figures -- from decommissioned weapons and military equipment.

AK-47s, land mines, rocket launchers, soldiers' boots and helmets, even sections of tank: all are warped and melded to create vivid sculptures sought by galleries and collectors around the world.

The work, says Mabunda, is "trying to represent each [person] who died with this same material." At the same time, the creation of each piece has a very practical consequence.

"If we destroy the weapons, the same weapon's not going to kill any more," he said.



Transforming weapons to art 04:32

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in rural Africa rescue the environment? One charity is betting on it.



Rhinos on a plane

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Africa's dying species

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One company thinks so. They're investing in insect

rapper's delight

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Mabunda is best known for his "thrones" -- chairs made from the twisted metal of guns, symbolizing the power held by strongmen. "If you're a soldier, you fight all day, but you have some hours you need to rest," he said.

Read

also: Dedicated followers of fashion: Congo's designer dandies

A recent exhibition in London, his first solo show in the British capital, also showcased a new direction: a series of tribal-inspired masks created from gun butts and bullets, drawing on African art traditions as well as referencing Mozambique's troubled recent history.

The masks "were responded to extremely well," by London audiences, said Jack Bell, whose gallery hosted Mabunda's latest exhibition. "They certainly play on form from traditional African art, but have a strong connection to modern and contemporary art," he said, citing comparisons to Pablo Picasso, Jean Dubuffet and Georges Braque.

A world away from the London art scene, Mabunda works to shape new pieces in his workshop. While it is through exhibitions in Paris, Tokyo and Dusseldorf that his pieces are finding acclaim, it is here that he hopes they will have the biggest impact.

Mabunda was first exposed to weapons through his uncle, a soldier in the ruling party's military wing, when he was only seven years music, travel and literature.

More from CNN



After years of custody battles, a reunion



Obama, Arab nations dance to different tunes (Opinion)



North Korea publicly executes defense minister



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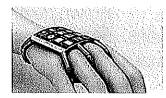


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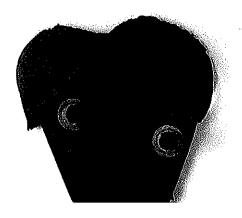
ARTISTS PUI

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ABOUT

Gonçalo Mabunda



Untitled (Mask), 2013

Born 1975, Maputo, Mozambique

Gonçalo Mabunda is interested in the collective memory of his country,
Mozambique, which has only recently emerged from a long and terrible civil war. He works with arms recovered in 1992 at the end of the sixteen-year conflict that divided the region.

In his sculpture, he gives anthropomorphic forms to AK47s, rocket launchers, pistols and other objects of destruction. While the masks could be said to draw on a local history of traditional African art, Mabunda's work takes on a striking Modernist edge akin to imagery by Braque and Picasso. The deactivated weapons of war carry strong political connotations, yet the beautiful objects he creates also convey a positive reflection on the transformative power of art and the



Gonçalo Mabunda To Be The First Mozambican in Venice Biennale

(2015-03-13) The list of artists for Okwui Enwezor's "All the World's Futures" at the 2015 Venice Biennale has been released and Mozambican Gonçalo Mabunda will represent the country, participating for the first time this year. Opens May 9.

•The show consists of over 136 artists from fifty-three countries, and will feature a space for live programming in the Central Pavilion designed by David Adjaye called The Arena. "The linchpin of this program will be the epic live reading of all three volumes of Karl Marx's 'Das Kapital'," Enwezor states.

"Here, 'Das Kapital' will serve as a kind of Oratorio that will be continuously read live, throughout the exhibition's seven months' duration."

The Biennale has also commissioned Kara Walker to direct a new production of Vincenzo Bellini's 'Norma' (1831), which will be staged at 'La Fenice' Opera House.

Who is Gonçalo Mabunda?

Gonçalo Mabunda works with weapons that were recovered at the end of the civil war in Mozambique, which divided the country for sixteen years until 1992. Deactivated rocket launchers, rifles and pistols are welded together to create a range of thrones and African-influenced masks.

In his sculpture, he gives anthropomorphic forms to AK47s, rocket launchers, pistols and other objects of destruction. While the masks could be said to draw on a local history of traditional African art, Mabunda's work takes on a striking Modernist edge akin to imagery by Braque and Picasso. The deactivated weapons of war carry strong political connotations, yet the beautiful objects he creates also convey a positive reflection on the transformative power of art and the resilience and creativity of African civilian societies.

Mabunda is most well known for his thrones. According to the artist, the thrones function as attributes of power, tribal symbols and traditional pieces of ethnic African art. They are without a doubt an ironic way of commenting on his childhood experience of violence and absurdity and the civil war in Mozambique that isolated his country for a long period.

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weapons of war carry strong political connotations, yet the beautiful objects he creates also convey a positive reflection on the transformative power of art and the resilience and creativity of African civilian societies.

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Mabunda's work has been exhibited at Museum Kunst Palast, Dusseldorf, Hayward Gallery, London, Pompidou, Paris, Mori Art Museum, Tokyo and the Johannesburg Art Gallery, Johannesburg among others.

Complete list of the artists in the 2015 Venice Biennale:

Jumana Emil Abboud B. 1971 Palestine, Lives And Works In Jerusalem

Adel Abdessemed B. 1971 Algeria, Lives And Works In Paris

Mathieu Kleyebe Abonnenc B. 1977 France, Lives And Works In Metz

Abounaddara Founded 2010 Syria/Palestine, Live And Work In Damascus

Boris Achour
B. 1966 France, Lives And Works In Paris

Terry Adkins B. 1953 - D. 2014, United States

Saâdane Afif B. 1970 France, Lives And Works In Berlin

Chantal Akerman B. 1950 Belgium, Lives And Works In Paris John Akomfrah

B. 1957 Ghana, Lives And Works In London

Karo Akpokiere

B. 1981 Nigeria, Lives And Works In Lagos And Berlin

Mounira Al Solh

B. 1978 Lebanon, Lives And Works In Beirut And Amsterdam

Meriç Algün Ringborg

B. 1983 Turkey, Lives And Works In Stockholm

Jennifer Allora & Guillermo Calzadilla

B. 1974 United States, B. 1971 Cuba, Live And Work In San Juan

Kutlug Ataman

B. 1961 Turkey, Lives And Works In London

Maja Bajevic

B. 1967 Bosnia, Lives And Works In Paris And Sarajevo

Ernesto Ballesteros

B. 1963 Argentina, Lives And Works In Buenos Aires

Sammy Baloji

B. 1978 Democratic Republic Of Congo, Lives And Works In Lubumbashi And Brussels

Rosa Barba

B. 1972 Italy, Lives And Works In Berlin

Georg Baselitz

B. 1938 Germany, Lives And Works In Munich

Eduardo Basualdo

B. 1977 Argentina, Lives And Works In Buenos Aires

Petra Bauer

B. 1970 Sweden, Lives And Works In Stockholm

Walead Beshty

B. 1976 United Kingdom, Lives And Works In Los Angeles

Huma Bhabha

B. 1962 Pakistan, Lives And Works In Poughkeepsie

Christian Boltanski

B. 1944 France, Lives And Works In Paris

Monica Bonvicini

B. 1965 Italy, Lives And Works In Berlin

Sonia Boyce

B. 1962 United Kingdom, Lives And Works In London

Daniel Boyd

B. 1982 Australia, Lives And Works In Sydney

Ricardo Brey

B. 1955 Cuba, Lives And Works In Gent

Marcel Broodthaers

B. 1924 - D. 1976, Belgium

Tania Bruguera

B. 1968 Cuba, Lives And Works In New York

Teresa Burga

B. 1935 Peru, Lives And Works In Lima

Keith Calhoun and Chandra Mccormick

B. 1955/B. 1957 United States, Live And Work In New Orleans

Cao Fei

B. 1978 China, Lives And Works In Beijing

Nidhal Chamekh

B. 1985 Tunisia, Lives And Works In Tunis And Paris

Olga Chernysheva

B. 1962 Russia, Lives And Works In Moscow

Tiffany Chung

B. 1969 Vietnam, Lives And Works In Ho Chi Minh City

Cooperativa Cráter Invertido

An Artistic Cooperative Founded 2011, Based In Mexico City

Creative Time Summit

A Non-Profit Organization Founded In 1974, Based In New York

Elena Damiani

B. 1979 Peru, Lives And Works In Copenhagen

Jeremy Deller

B. 1966 United Kingdom, Lives And Works In London

Thea Djordajdze

B. 1971 Georgia, Lives And Works In Berlin

Marlene Dumas

B. 1953 South Africa, Lives And Works In Amsterdam

E-Flux Journal

A Publishing Platform Founded In 2008, Based In New York

Melvin Edwards

B. 1937 United States, Lives And Works In New York

Inji Efflatoun

B. 1924 - D. 1989 Egypt

Antje Ehmann and Harun Farocki

B. 1968 Germany, Lives And Works In Berlin / B. 1944 - D. 2014 Germany

Maria Eichhorn

B. 1962 Germany, Lives And Works In Berlin

Walker Evans

B. 1903 - D. 1975 United States

Harun Farocki

B. 1944 - D. 2014, Germany

Emily Floyd

B. 1972 Australia, Lives And Works In Sydney

Peter Friedl

B. 1960 Austria, Lives And Works In Berlin

Coco Fusco

B. 1960 United States, Lives And Works In New York

Marco Fusinato

B. 1964 Australia, Lives And Works In Melbourne

Charles Gaines

B. 1944 United States, Lives And Works In Los Angeles

Ellen Gallagher

B. 1965 United States, Lives And Works In Rotterdam

Ana Gallardo

B. 1958 Argentina, Lives And Works In Buenos Aires

Dora Garcia

B. 1965 Spain, Lives In Barcelona

Theaster Gates

B. 1973 United States, Lives And Works In Chicago

Isa Genzken

B. 1948 Germany, Lives And Works In Berlin

Gluklya

B. 1969 Russia, Lives And Works In Saint Petersburg

Sônia Gomes

B. 1948 Brazil, Lives And Works In Belo Horizonte

Katharina Grosse

B. 1961 Germany, Lives And Works In Berlin

Gulf Labor

A Transnational Coalition Of International Artists Founded In 2010

Andreas Gursky

B. 1955 Germany, Lives And Works In Düsseldorf

Hans Haacke

B. 1936 Germany, Lives And Works In New York

Joana Hadjithomas and Khalil Joreige

B. 1969 Lebanon, Live And Work In Paris And Beirut

Newell Harry

B. 1972 Australia, Lives And Works In Sydney

Kay Hassan

B. 1956 South Africa, Lives And Works In Johannesburg

Thomas Hirschhorn

B. 1957 Switzerland, Lives And Works In Paris

Carsten Höller

B. 1961 Belgium, Lives And Works In Stockholm

Nancy Holt and Robert Smithson

B. 1938 - D. 2014 / B.1938 - D. 1973 United States

Heung Soon Im

B. 1969 South Korea, Lives And Works In Seoul

Invisible Borders: Trans-African Photographers

An Artists' Organization Founded In 2011, Based In Lagos

Tetsuya Ishida

B. 1973 – D. 2005 Japan

Ji Dachun

B. 1968 China, Lives And Works In Beijing

.Isaac Julien

B. 1960 United Kingdom, Lives And Works In London

Hiwa K.

B. 1975 Iraq, Lives And Works In Berlin

Samson Kambalu

B. 1975 Malawi, Lives And Works In London

Ayoung Kim

B. 1979 South Korea, Lives And Works In Seoul

Alexander Kluge

B. 1932 Germany, Lives And Works In Munich

Emily Kame Kngwarreye

B. 1910 - D. 1996, Australia

Runo Lagomarsino

B. 1977 Sweden, Lives And Works In Stockholm And São Paulo

Sonia Leber and David Chesworth

B. 1959 Australia, B. 1958 United Kingdom, Live And Work In Melbourne

Glenn Ligon

B. 1960 United States, Lives And Works In New York

Gonçalo Mabunda

.B. 1975 Mozambique, Lives And Works In Maputo

'Madhusudhanan

B. 1956 India, Lives And Works In New Delhi And Kerala

Ibrahim Mahama

B. 1987 Ghana, Lives And Works In Tamale

David Maljkovic

B. 1973 Croatia, Lives And Works In Zagreb

Victor Man

B. 1974 Romania, Lives And Works In Berlin

Abu Bakarr Mansaray

B. 1970 Sierra Leone, Lives And Works In Freetown And The Netherlands

Chris Marker

B. 1921 - D. 2012, France

Kerry James Marshall

B. 1955 United States, Lives And Works In Chicago

Helen Marten

B. 1985 United Kingdom, Lives And Works In London

Fabio Mauri

B. 1926 - D. 2009 Italy

Steve Mcqueen

B. 1969 United Kingdom, Lives And Works In Amsterdam

Naeem Mohaiemen

B. 1969 Bangladesh, Lives And Works In Dhaka And New York

Jason Moran

B. 1975 United States, Lives And Works In New York

Ivana Müller

B. 1972 Croatia, Lives And Works In Paris

Lavar Munroe

B. 1982 Bahamas, Lives And Works Between Chapel Hill, North Carolina And Washington DC

Oscar Murillo

B. 1986 Colombia, Lives And Works In London

Wangechi Mutu

B. 1972 Kenya, Lives And Works In New York

Hwayeon Nam

B. 1979 South Korea, Lives And Works In Seoul And Berlin

Bruce Nauman

B. 1941 United States, Lives And Works In New Mexico

Cheikh Ndiaye

B. 1970 Senegal, Lives And Works In New York, Dakar And Lyon

Olaf Nicolai

B. 1962 Germany, Lives And Works In Berlin

Chris Ofili

B. 1968 United Kingdom, Lives And Works In London And Trinidad

Emeka Ogboh

B. 1977 Nigeria, Lives And Works In Lagos And Berlin

Philippe Parreno

B. 1964 France, Lives And Works In Paris

Pino Pascali

B. 1935 - D. 1968, Italy

Adrian Piper

B. 1948 United States, Lives And Works In Berlin

Lemi Ponifasio

B. 1964 New Zealand, Lives And Works In Auckland

Qiu Zhijie

B. 1969 China, Lives And Works In Beijing

Raha Raissnia

B. 1968 Iran, Lives And Works In New York

Raqs Media Collective

(Narula, Monica; Bagchi, Jeebesh; Sengupta, Shuddhabrata)

A Collective Founded 1992 India, Based In New Delhi

Lili Reynaud-Dewar

B. 1975 France, Lives And Works In Grenoble

Mykola Ridnyi

B. 1985 Ukraine, Lives And Works In Kharkiv

Liisa Roberts

B. 1969 France, Lives And Works In New York, Helsinki And Saint Petersburg

Mika Rottenberg

B. 1976 Argentina, Lives And Works In New York

Joachim Schönfeldt

B. 1958 South Africa, Lives And Works In Johannesburg

Massinissa Selmani

B. 1980 Algeria, Lives And Works In Algiers And Tours

Fatou Kandé Senghor

B 1971 Senegal, Lives And Works In Dakar

Prasad Shetty and Rupali Gupte

B. 1974 India, Live And Work In Mumbai

Gedi Sibony

B. 1973 United States, Lives And Works In New York

Gary Simmons

B. 1964 United States, Lives And Works In New York

Taryn Simon

B. 1975 United States, Lives And Works In New York

Lorna Simpson

B. 1960 United States, Lives And Works In New York

Robert Smithson

B. 1938 - D. 1973, United States

Mikhael Subotzky

B. 1981 South Africa, Lives And Works In Johannesburg

Mariam Suhail

B. 1979 Pakistan, Lives And Works In Bangalore

Sarah Sze

B. 1969 United States, Lives And Works In New York

The Propeller Group

A Collective Founded 2006 Vietnam/US, Live And Work In Ho Chi Minh City

The Tomorrow

A Journal Founded 2014 Italy, Based In Milan

Rirkrit Tiravanija

B. 1961 Thailand, Lives And Works In New York, Berlin And Chiang Mai

Barthélémy Toguo

B. 1967 Cameroon, Lives And Works In Paris And Bandjoun

Xu Bing

B. 1955 China, Lives And Works In Beijing

Ala Younis

The fifty-sixth edition of the Venice Biennale opens May 9 with previews beginning May 6, and runs through November 22.

Source: Artforum

Second Source: De Zeen

Third Source: Jack bell Gallery

Photo: DE Zeen / One of Gonçalo Mabunda's thrones

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Conflict and development

Art of war: melding arms into weapons of mass attraction - in pictures

Thousands of weapons in some of the world's most conflict-scarred states are being hammered, filed and welded into symbols of hope. From Maputo to Mexico City, artists are transforming decommissioned arms into an arsenal of art to highlight the futility of war and promote psychological healing



ै () () Thursday & March 2014 04.03 EST

Janise Elie

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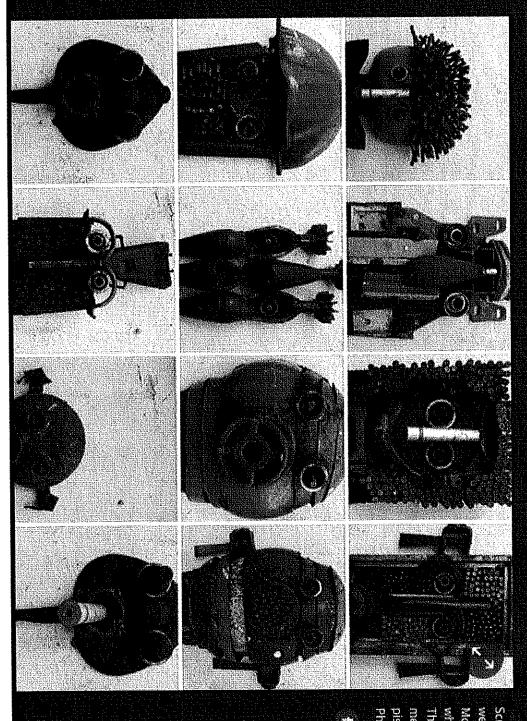
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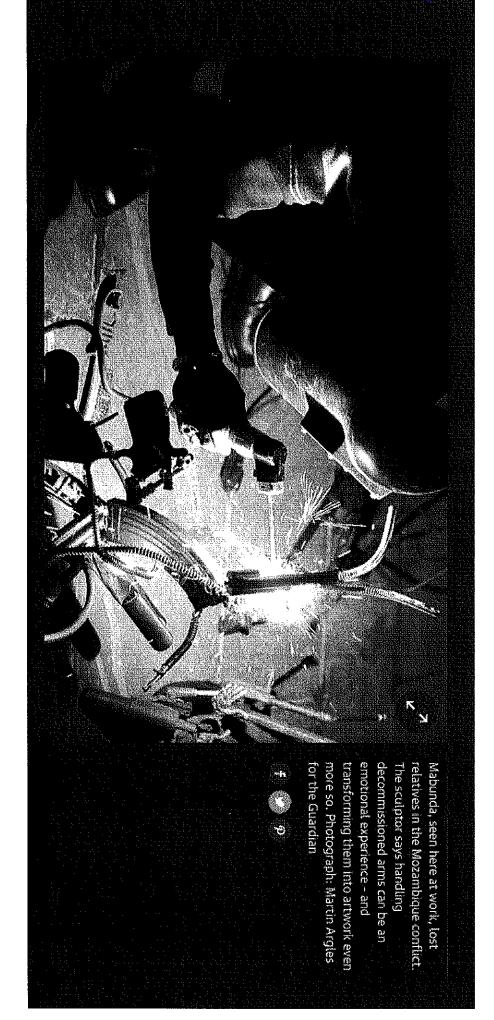
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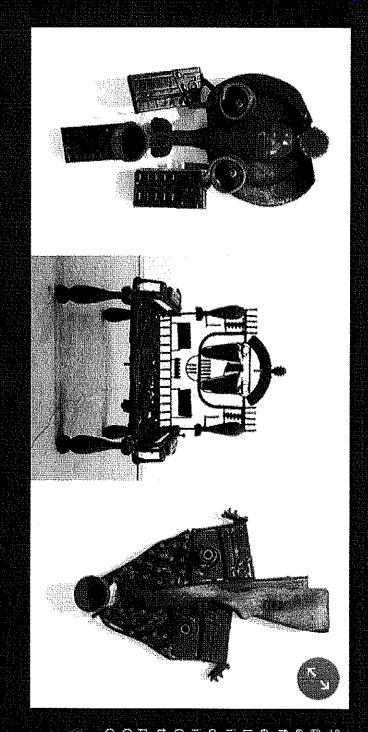
☑⇒

Non-Violence, or the Knotted Gun, by Carl Fredrik Reutersward. The bronze replica of a 45-calibre revolver, a gift from Luxembourg to the United Nations, was sculpted in memory of the Swedish artist's longtime friend John Lennon. Though not created from recycled munitions, the sculpture has been cited as one of the inspirations behind the arms-to-art movement. Photograph: UN



Sculptor Gonçalo Mabunda recycles weapons recovered from Mozambique's 16-year civil war, which ended after a truce in 1992. The Maputo-born artist twists and melds AK-47s, rocket launchers and pistols into anthropomorphic forms. Photograph: Gonçalo Mabunda





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Some of Mabunda's more iconic pieces, such as tribal thrones made entirely of bullets and masks fashioned from AK-47s, have been exhibited at the Hayward Gallery in London, the Museum of Modern Art in New York, and the Pompidou centre in Paris. Fans of his sculptures include the former US president Bill Clinton, who commissioned the artist to create trophies for his philanthropic organisation the Clinton Global Initiative. Photograph: Gonçalo Mabunda

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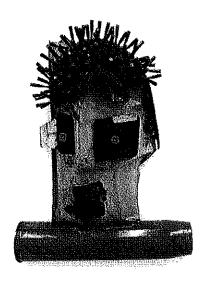
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GONÇALO MABUNDA

1975 born in Maputo, Mozambique

The residual bric-a-brac of war are the found objects that Goncalo Mobunda recycles as his medium of expression. His country of Mozambique, like many in Africa, had lived through a devastating civil war when he embarked on gathering shards of national memory in the form of discarded weapons fragments, piecing them together into sculptures. Out of that he forged a fantastical iconography derived from African fetish traditions rendered in rusting steel. He welds together menacing instruments of death, bullets, pistols, parts of Kalashnikovs, into disarming objects, deceptively esthetic, fused to suggest a multiplicity of meanings, not least to suggest alternate uses, and indeed alternate visions of how his culture might have otherwise employed itself with ambient materials. The objects simultaneously invite and repel, obtruding from the universe of child soldiers whose toys they once were.



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AAD AT THE ANNUAL CLINTON GLOBAL INITIATIVE SUMMIT IN NEW YORK

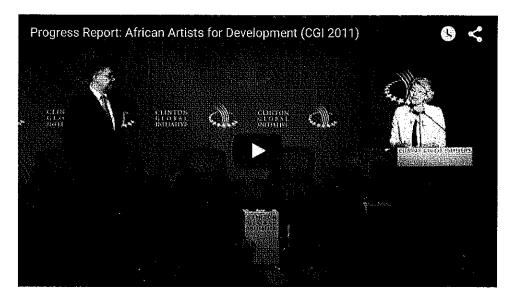
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AD AT THE ANNUAL CENTOR GLOBAL INITIATIVE SUMMED IN NEW YORK.



On the occasion of a special session called "From conflict to creativity, reducing violence through the arts," African Artists for Development, has been recognized for its project « Les Bulles de Bukavu » in the Democratic Republic of the Congo. Irina Bokova, General Director of UNESCO, has congratulated Matthias Leridon for the reverence of AAD's commitments and underligned the importance of such a project for Bukavu's community development.

AAD attended the annual Clinton Global Initiative summit in New York, where it presented its "Commitments to Action" alongside hundreds of CEOs, heads of State and government and NGO presidents from around the world. Each year, the event gives leaders in the economic, political and development world a unique opportunity to meet, take decisions together and make sustainable, quantitative commitments on key issues affecting our world.



Founded in 2005 by former U.S. President Bill Clinton, the Clinton Global Initiative is a unique philanthropic organization. The CGI's intention is to fight against the negative effects of globalization and underdevelopment, not by funding or by making direct field activities, but rather by bringing under its umbrella of companies, institutions or individuals carrying innovative projects that engage in itself, to establish "Commitments to Action" that are specific and measurable. Rather than build a new

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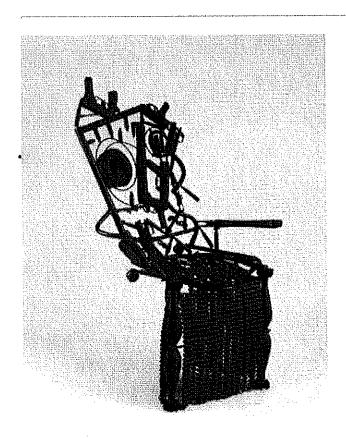
structure for discussion, Bill Clinton wanted, through the creation of the CGI, to propose a new form of global summit that would focus on concrete results enabled by the combination of unconventional minds and personalities.

Already under the impetus of Matthias and Gervanne Leridon, Gonçalo Mabunda is an African artist who created the 2008 CGI Awards, which were awarded to individuals that year for their social engagement. Representing planet earth, the trophies were made from bullet casings and weapons recovered by the artist at the end of the civil war in Mozambique, symbolizing the seizure and the overthrow of the violence for peace and development.

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Fonds de dotation African Artists for Development, loi du 4 août 2008 de Modernisation de l'Economie 46-18 lmpasse d'Anlin - 75008 Paris - France - Tél : +33(0)1 44 14 99 78 - Fax : +33(0)1 44 14 99 77

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Harmony Chair

Artist: Gonçalo Mabunda (Designer)

Medium: Welded weapons (handguns, rifles, land mines, bullets, machine gun belts, rocket-

propelled grenades), iron alloy

Dates: 2009

Dimensions: 48 1/16 x 38 3/16 x 29 15/16 in. (122.0 x 97.0 x 76.0 cm)

Collection: Arts of Africa

Museum Location: Brooklyn Museum, BMA, SPECIAL EXHIBITION, 1-Rotating 1Q23

Exhibitions:

o Double Take: African Innovations (October 29, 2014 through July 2016)

Accession Number: 2013.26.2

Image: 2013.26.2_threequarter_PS9.jpg. Brooklyn Museum photograph, Nov 30, 2013



GORÇALO MARINDA

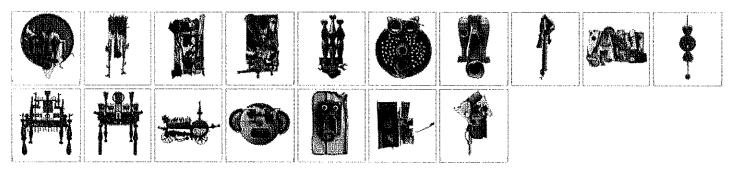


EXHIBITIONS

2013 | Centro de Artes Nadir Afonso, Boticas, Portugal

http://www.cm-boticas.pt/noticias/default.php?id=4o

"llegível Memória"



2013 | Jack Bell Gallery, London, UK

http://www.jackbellgallery.com/exhibitions/34/overview/

"When I get green"















2012 | Marrakech Art Fair, Marrakech, Marrocos

2012 | Sandton Art Gallery, Johannesburg, South Africa

"Made in Africa"

2012 | Kulunguana Gallery, Maputo-Mozambique

"O Círculo"

2012 | Galeria Bozart, Lisboa, Portugal

http://www.galeriabozart.com/exposition_view.php?expo_id=19

"Utopia da lei"













2011 | Intoto Gallery, Johannesburg, South África

2011 | Johannesburg Art Fair, Johannesburg, South África

Case 2:15-cv-05019-AB DECEMBENG 1500 Page 80 of 82

2008 | Museum of Arts and Design, New York, USA

"Second Lives" group show

2008 | Afronova Gallery, Johannesburg , South Africa

"My new voice" solo exhibition

1 2 3 next | last »

GORÇALO MABUNDA



EXHIBITIONS

"Afronism"
2007 Museum Het Domein Waardij Kunstinsllingen, Amsterdam, Holland "Group show"
2006 Centre Culturel de L'Espate, Le Mans, France "Arms into Art"
2005 Galleria d'Arte La Nuvola, Rome, Italy "Give Voice" solo exhibition •
2005 Gallery 23 / SBK Foundation, Amsterdam, Holland "Arms into Art" collaboration with Eugenio Saranga
2005 Instituto Galileo galilei, Rome, Italy "Group show"
2004 Musei Capitolini, Rome, Italy "Festa D'africa festival"
2004 Barcelone, Spain "Forum Barcelona"
2004 Army Museum, Delft, Holland "Arms into Art"
2004 Alliance Française in Tanzania, Mauricius, Kenya, Ethiopia, South Africa, Burundi, Namibia, Uganda "Arms into Art" touring solo exhibition
« first « previous 1 2 3 next» last»

GORGALO MAGRICALO



EXHIBITIONS

2003 Felix foundation, Amsterdam, Holland Maison des Cultures du Monde, Paris, France	
2002 Oxo Gallery, London, UK "Arms into Art"	
2002 Centro Dionysia, Roma, Italy "Arms into Art"	entre and extensive erre the annu veeta en er equipeles administrative en element en en eques etc. Commente e
2002 Afronova, Johannesburg, South Africa http://www.afronova.com/goncalo-mabunda.html "Playtime festival"	
2001 Vancouver, British Columbia, Canada "Arms into Art"	Bod in dien i erroris militadi in 29 er en es sutatuatables (uto ori erres reservanda autobres), er en estadu de cultura, erregista en en
2001 New York, USA International Conference for destruction of Arms	
2000 Nucleo de Arte, Maputo, Mozambique "An Artist, a gesture", solo exhibition.	HAMPERIA MERIKANAN MERIKAN MERIKAN MERIKAN MERIKAN PERIKAN MERIKAN MERIKAN MERIKAN MERIKAN MERIKAN MERIKAN MERIKAN MENJAN MERIKAN MERI
1997 Durban Art Gallery, Durban, South Africa	which is a surface of the surface of the surface $ au$ and $ au$ are $ au$ and $ au$ and $ au$ and $ au$ are $ au$ and $ au$ and $ au$ are $ au$ and $ au$ and $ au$ are $ au$ are $ au$ and $ au$ are $ au$ are $ au$ and $ au$ are $ au$ are $ au$ and $ au$ are $ au$ are $ au$ and $ au$ are $ au$ are $ au$ and $ au$ are $ au$ are $ au$ and $ au$ are $ au$ are $ au$ and $ au$ are $ au$ are $ au$ and $ au$ are $ au$ are $ au$ are $ au$ and $ au$ are $ au$ are $ au$ are $ au$ and $ au$ are $ au$ are $ au$ and $ au$ are $ au$ are $ au$ are $ au$ are $ au$ are $ au$ and $ au$ are $ au$ and $ au$ are $ au$
1995 Technikon Natal, Durban, South Africa "Ujamaa IV Workshop" with Andries Botha	
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